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Attorney for Defendant, SEBASTIAN GHEORGHE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * * *

UNITED STATES OF AMERICA

Plaintiff,

v.

SEBASTIAN GHEORGHE,

Defendant.

CASE NO: 2:13-cr-00272-LDG-CWH-1

STIPULATION TO CONTINUE SUPERVISED RELEASE REVOCATION HEARING

IT IS HEREBY STIPULATED and AGREED by and between Kimberly Frayn, Assistant United States Attorney, Richard A. Schonfeld, attorney for Defendant, Sebastian Gheorghe, that the Supervised Release Revocation hearing scheduled for Monday, May 4, 2015 at 9:00 a.m. be vacated and continued to a time convenient to this Court, preferably after 60 days from the current setting.

This Stipulation is entered into for the following reasons:

1. That the parties are in negotiations which may result in a global resolution of the two outstanding cases. Additional time is necessary to accomplish this potential resolution;

2. That counsel for Defendant has been in communication with Assistant United States Attorney Kimberly Frayn and there is no objection to the continuance as outlined above;

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1 3. That Defendant, Sebastian Gheorghe, is incarcerated and does not oppose this
2 continuance;

3 4. That the probation officer assigned to this case will be out of the district on the
4 scheduled date; and
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6 5. That the interests of justice and judicial economy are served by the requested relief.

7 **DATED** this ____ day of April, 2015.

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9 **UNITED STATES ATTORNEY**

CHESNOFF & SCHONFELD


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11 _____
12 /s/
13 **KIMBERLY FRAYN, AUSA**
14 333 Las Vegas Blvd. South, Suite 500
15 Las Vegas, Nevada 89101
16 Attorney for Plaintiff

17 _____
18 /s/
19 **RICHARD A. SCHONFELD, ESQ.**
20 Nevada Bar No. 6815
21 520 South Fourth Street
22 Las Vegas, Nevada 89101
23 Attorney for Defendant, Sebastian
24 Gheorghe

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17 **ORDER**

18 **IT IS HEREBY ORDERED** that the Supervised Release Revocation hearing presently
19 scheduled for Monday, May 4, 2015, at the hour of 9:00 a.m be vacated and the same be continued
20 to the 9th day of July, 2015, at the hour of 10:00 a.m.

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22 **DATED** this 27 day of April, 2015.

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24 _____
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26 **UNITED STATES DISTRICT JUDGE**
27 **LLOYD D. GEORGE**

28 Submitted by:

29 _____
30 /s/
31 **RICHARD A. SCHONFELD, ESQ.**
32 Nevada Bar # 6815
33 Attorney for Defendant, Sebastian Gheorghe